

1 [Submitting Counsel on Signature Page]

2 [Additional parties and counsel listed on
3 signature page]

4
5
6
7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 THIS DOCUMENT RELATES TO:

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY PRODUCTS
13 LIABILITY LITIGATION

14 -----
15 *People of the State of California, et al. v. Meta*
16 *Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

17 **DRAFT JURY INSTRUCTIONS AND**
18 **VERDICT FORMS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's direction at the August and September 2025 Case Management Conferences, enclosed please find the draft jury instructions and verdict forms jointly prepared by the State Attorneys General and the Meta Defendants for the purpose of informing trial-planning discussions. In addition, each Party has submitted a brief statement regarding the proposed instructions and verdict forms. A color key is provided below to indicate language that remains at issue.

Black	Uncontested by either side following negotiations
Red	State AG proposed language
Blue	Meta proposed language

STATE ATTORNEYS GENERAL'S OVERVIEW & SUMMARY OF POSITIONS

The State AGs welcome this opportunity to assist the Court in understanding the scope of the elements required under each state's consumer protection laws, in addition to the requirements for COPPA claims. These materials highlight the substantial commonalities in elements across the states' jurisdictions and reflect the Parties' relative proximity to agreement on key substantive issues. Meta seeks to turn this exercise into an opportunity to brief disputes over individual states' legal requirements and instructions, and while the State AGs have included preliminary responses to counter those arguments, these positions are non-exhaustive and set forth without prejudice to future arguments to be made at the appropriate time, including those to be raised in forthcoming summary judgment motions or in motions in limine.

A bipartisan coalition of State AGs sued together on the same Complaint, setting forth the same facts and the same legal theories against Meta regarding the harms its products perpetuate amongst youth across the country and its deceptive conduct related to those harms. This coalition of State AGs have identical interests in enforcing their states' laws and protecting their citizens from the same deceptive and abusive conduct that has the same effect upon each states' citizens.

Despite minor textual variations—such as differences in statutory phrasing or available remedies—the core legal standards under each relevant state's consumer protection laws are materially aligned. Accordingly, the State AGs asserting consumer protection claims in this case intend to present at trial the same witnesses (both fact and expert), the same documentary evidence, and articulate the same overarching legal theories. Indeed, all states are asserting COPPA claims, and multiple states have consumer protection claims predicated on COPPA violating conduct. While the Parties have disputes regarding certain aspects of the proposed jury instructions, these disagreements often reflect recurring themes. For example, Meta frequently seeks to introduce additional elements such as intent or privity in consumer protection statutes or to revisit statutory construction issues that have already been resolved. These disputes underscore the shared architecture of the states' consumer protection laws.

Meta seeks to use this jury instruction and verdict form exercise to argue that the State AGs' case must be severed into multiple trials. First, it is procedurally improper. Meta fails to identify any legal authority that would permit severance of this case—brought and litigated together by the State

1 AGs—into several separate trials, particularly given the State AGs common claims and interests.
2 Second, the jury instructions and verdict forms show that even if this case were severable in the
3 manner Meta advocates, such an approach would not serve judicial economy and would instead create
4 substantial and unnecessary burdens on the parties, the Court, and any witnesses who would be asked
5 to testify at multiple trials. Should the Court nonetheless consider this approach, the State AGs
6 respectfully request that a briefing schedule be set so that the parties can fully set forth their positions
7 in writing and the matter can be heard at an upcoming CMC.

8 The Parties diverge most significantly on the structure of the proposed verdict forms. The
9 State AGs’ proposed forms closely follow the general verdict format outlined in this Court’s Standard
10 Order re: Pretrial Instructions in Civil Cases, Section 3.j. This format offers a clear, legally sound,
11 and efficient mechanism for the jury to render its verdict. In contrast, Meta’s proposed verdict forms
12 turn simple elements into interrogatories – which often do not align with the legal standards. Meta’s
13 fragmented and unnecessarily interrogatory-heavy proposed verdict forms create substantial risk of
14 confusion, inconsistent verdicts, and legal error. The AGs’ approach better preserves the jury’s role
15 as factfinder and avoids unnecessary complexity—particularly where claims are presented in the
16 alternative (e.g., unfair vs. deceptive practices).

17 For these reasons, the State AGs respectfully submit that their proposed instructions and
18 verdict forms provide the most faithful and functional framework for guiding the jury’s deliberations
19 and ensuring a verdict that is both legally sound and practically reliable.
20
21
22
23
24
25
26
27
28

META’S STATEMENT REGARDING PROPOSED DRAFT JURY INSTRUCTIONS
AND VERDICT FORMS

After conferring and exchanging several rounds of drafts, the parties have resolved numerous disagreements as to the structure and substance of these preliminary instructions and verdict forms. In case helpful to the Court, Meta briefly sets forth below certain trial-planning considerations and its position as to certain remaining disagreements, which it will be prepared to discuss further at the October 24 CMC:

Trial-Planning Considerations: Given the numerous material variations across the states’ laws, it does not appear to Meta that there is any fair and administrable way to combine all 29 states—including 18 states with consumer protection claims—in a single trial. Even a verdict form directing the jury to proceed element-by-element in assessing the AGs’ claims (discussed below) is not sufficient to solve the administrability issues given the various elements and definitions across the 18 states’ consumer protection statutes. For example, 9 states require intent for either or both deception or unfairness claims, 10 states require intent for entitlement to civil penalties, and there are further nuances among those states as to how intent and/or willfulness are defined and applied to the facts. Trying these claims together in a single trial risks prejudice to Meta because, as the AGs already seek to exploit in their proposed instructions, the absence of an element in one state’s statute may lead a jury to underestimate or disregard the burden for another state where that element is required. In addition, evidence the AGs seek to introduce in support of certain claims may be unduly prejudicial to Meta’s ability to defend itself against other claims. Certain issues and/or claims, moreover, may be suitable to a bench trial rather than a jury trial. These issues may make the case appropriate for trial of a subset of states or claims first, or bifurcation in some form. Meta proposes that the parties continue conferring about these issues in advance of the October 24 CMC.

Verdict Form: To the extent multiple states are tried together, a special verdict form is necessary to adequately reflect the numerous substantive variations across the states’ consumer protection laws. Such a form will promote consideration of each element in light of those variations and mitigate the risk of a jury conflating standards across states that may seem similar but are actually materially different—as becomes clear when the questions are broken out. The verdict form should

1 also require the jury to address each allegedly deceptive statement and/or unfair practice individually
2 to enable the Court to determine the number of violations (if any) for assessing any penalties and
3 structuring any injunctive relief based on which practices (if any) any jury finds unfair.

4 **Jury Instructions:** Among other remaining disagreements in the instructions, it risks juror
5 confusion and prejudice to instruct the jury that the AGs do not need to prove certain elements as part
6 of their claims, particularly with respect to elements (such as causation and intent) that already vary
7 significantly across the states that do require them. Meta also objects to the extent the AGs seek to
8 characterize the state statutes' protections as "broad" or to instruct the jury to "liberally construe"
9 certain statutory provisions. It is the role of the Court to interpret the law, and the role of the jury to
10 apply the law as instructed by the Court, without further interpretation.

DATED: 10/10/2025

Respectfully submitted,

PHILIP J. WEISER

Attorney General
State of Colorado

ROB BONTA

Attorney General
State of California

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066, *pro hac vice*
Deputy Solicitor General
Jason Slothouber, CO Reg. No. 43496, *pro hac vice*
Chief Trial Counsel, Consumer Protection
Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*
First Assistant Attorney General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6000
Krista.Batchelder@coag.gov

Attorneys for Plaintiff State of Colorado, ex rel. Philip J. Weiser, Attorney General

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
David Beglin (CA SBN 356401)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.ONeill@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

RUSSELL COLEMAN

Attorney General
Commonwealth of Kentucky

MATTHEW J. PLATKIN

Attorney General
State of New Jersey

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109), *pro hac vice*
Philip Heleringer (KY Bar No. 96748), *pro hac vice*
Zachary Richards (KY Bar No. 99209), *pro hac vice*
Daniel I. Keiser (KY Bar No. 100264), *pro hac vice*
Matthew Cocanougher (KY Bar No. 94292), *pro hac vice*

By: /s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008), *Pro hac vice*
Assistant Attorney General
Thomas Huynh (NJ Bar No. 200942017), *Pro hac vice*
Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021), *Pro hac vice*
Mandy K. Wang (NJ Bar No. 373452021),

Assistant Attorneys General
 1024 Capital Center Drive, Ste. 200
 Frankfort, KY 40601
 Christian.Lewis@ky.gov
 Philip.Heleringer@ky.gov
 Zach.Richards@ky.gov
 Daniel.Keiser@ky.gov
 Matthew.Cocanougher@ky.gov
 Phone: (502) 696-5300
 Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of
 Kentucky*

KRIS MAYES
 Attorney General
 State of Arizona

/s/ Laura Dilweg
 Laura Dilweg (AZ No. 036066, CA No.
 260663)
 Chief Counsel - Consumer Protection and
 Advocacy Section
 Assistant Attorney General
 Arizona Attorney General's Office
 2005 North Central Avenue
 Phoenix, AZ 85004
 Phone: (602) 542-3725
 Fax: (602) 542-4377
 Laura.Dilweg@azag.gov

Attorneys for Plaintiff State of Arizona

KATHLEEN JENNINGS
 Attorney General
 State of Delaware

/s/ Ryan Costa
 Marion Quirk (DE Bar 4136), *pro hac vice*
 Director of Consumer Protection
 Ryan Costa (DE Bar 5325), *pro hac vice*

Pro hac vice
 Deputy Attorneys General
 New Jersey Office of the Attorney General,
 Division of Law
 124 Halsey Street, 5th Floor
 Newark, NJ 07101
 Tel: (973) 648-2052
 Kashif.Chand@law.njoag.gov
 Thomas.Huynh@law.njoag.gov
 Verna.Pradoxay@law.njoag.gov
 Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs Matthew J. Platkin,
 Attorney General for the State of New Jersey,
 and Elizabeth Harris, Acting Director of the
 New Jersey Division of Consumer Affairs*

WILLIAM TONG
 Attorney General
 State of Connecticut

/s/ Rebecca Borné
 Rebecca Borné
 (CT Juris No. 446982), *pro hac vice*
 Tess E. Schneider
 (CT Juris No. 444175), *pro hac vice*
 Krislyn M. Launer
 (CT Juris No. 440789), *pro hac vice*
 Assistant Attorneys General
 Connecticut Office of the Attorney General
 165 Capitol Avenue
 Hartford, Connecticut 06106
 Phone: 860-808-5306
 Fax: 860-808-5593
 Rebecca.Borne@ct.gov
 Tess.Schneider@ct.gov
 Krislyn.Launer@ct.gov

Attorneys for Plaintiff State of Connecticut

ANNE E. LOPEZ
 Attorney General
 State of Hawai'i

/s/ Douglas S. Chin
 Christopher J.I. Leong (HI JD No. 9662), *pro
 hac vice*
 Supervising Deputy Attorney General

Deputy Director of Consumer Protection
 Delaware Department of Justice
 820 N. French Street, 5th Floor
 Wilmington, DE 19801
 Phone: (302) 683-8811
Marion.Quirk@delaware.gov
Ryan.Costa@delaware.gov

Attorneys for Plaintiff State of Delaware

Kelcie K. Nagata (HI JD No. 10649), *pro hac vice*
 Deputy Attorney General
 Department of the Attorney General
 Commerce and Economic Development
 Division
 425 Queen Street
 Honolulu, Hawai'i 96813
 Phone: (808) 586-1180
Christopher.ji.leong@hawaii.gov
Kelcie.k.nagata@hawaii.gov
 Douglas S. Chin (HI JD No. 6465), *pro hac vice*
 John W. Kelly (HI JD No. 9907), *pro hac vice*
 Special Deputy Attorney General
 Starn O'Toole Marcus & Fisher
 733 Bishop Street, Suite 1900
 Honolulu, Hawai'i 96813
 Phone: (808) 537-6100
dchin@starnlaw.com
jkelly@starnlaw.com

Attorneys for Plaintiff State of Hawai'i

RAÚL R. LABRADOR

Attorney General
 State of Idaho

By: /s/ James Simeri
 James Simeri (ID Bar No. 12332)
 Deputy Attorney General
 Attorney General's Office
 P.O. Box 83720
 Boise, ID 83720-0010
 (208) 334-4114
james.simeri@ag.idaho.gov

Attorneys for Plaintiff State of Idaho

KWAME RAOUL

Attorney General
 State of Illinois

/s/ Matthew Davies
 Susan Ellis, Chief, Consumer Protection
 Division (IL Bar No. 6256460)
 Greg Grzeskiewicz, Chief, Consumer Fraud
 Bureau (IL Bar No. 6272322)
 Jacob Gilbert, Deputy Chief, Consumer Fraud
 Bureau (IL Bar No. 6306019)
 Matthew Davies, Assistant Attorney General,
 Consumer Fraud Bureau (IL Bar No.
 6299608), *pro hac vice*
 Daniel B. Roth, Assistant Attorney General,
 Consumer Fraud Bureau (IL Bar No. 6290613)
 Meera Khan, Assistant Attorney General,
 Consumer Fraud Bureau (IL Bar No. 6345895)
 Office of the Illinois Attorney General
 115 S. LaSalle Street
 Chicago, Illinois 60603
 312-814-2218
Susan.Ellis@ilag.gov
Greg.Grzeskiewicz@ilag.gov

Jacob.Gilbert@ilag.gov
 Matthew.Davies@ilag.gov
 Daniel.Roth@ilag.gov
 Meera.Khan@ilag.gov

*Attorneys for Plaintiff the People of the State
 of Illinois*

THEODORE E. ROKITA

Attorney General
 State of Indiana

/s/ Scott L. Barnhart

Scott L. Barnhart (IN Atty No. 25474-82)

pro hac vice

Chief Counsel and Director of Consumer
 Protection Corinne Gilchrist (IN Atty No.
 27115-53)

pro hac vice

Section Chief, Consumer Litigation

Mark M. Snodgrass (IN Atty No. 29495-49)

pro hac vice

Deputy Attorney General

Office of the Indiana Attorney General

Indiana Government Center South

302 West Washington St., 5th Floor

Indianapolis, IN 46203

Telephone: (317) 232-6309

Scott.Barnhart@atg.in.gov

Corinne.Gilchrist@atg.in.gov

Mark.Snodgrass@atg.in.gov

Attorneys for Plaintiff State of Indiana

LIZ MURRILL

Attorney General

State of Louisiana

/s/ Asyl Nachabe

Asyl Nachabe (LA Bar No. 38846)

pro hac vice

Assistant Attorney General

Louisiana Department of Justice

Office of the Attorney General

Public Protection Division

Complex Litigation Section

1885 N 3rd Street, 4th Floor

Baton Rouge, LA 70802

KRIS W. KOBACH

Attorney General

State of Kansas

/s/ Sarah Dietz

Sarah Dietz, Assistant Attorney General

(KS Bar No. 27457), *pro hac vice*

Office of the Kansas Attorney General

120 SW 10th Avenue, 2nd Floor

Topeka, Kansas 66612

Telephone: (785) 296-3751

sarah.dietz@ag.ks.gov

Attorney for Plaintiff State of Kansas

AARON M. FREY

Attorney General

State of Maine

/s/ Michael Devine

Michael Devine (Maine Bar No. 5048),

pro hac vice

Assistant Attorney General

Office of the Maine Attorney General

6 State House Station

Augusta, ME 04333-0006

(207) 626-8829

michael.devine@maine.gov

Attorney for Plaintiff State of Maine

Tel: (225) 326-6435
 NachabeA@ag.louisiana.gov
Attorney for State of Louisiana

ANTHONY G. BROWN
 Attorney General
 State of Maryland

/s/ Elizabeth J. Stern
 Philip D. Ziperman (Maryland CPF No.
 9012190379), *pro hac vice*
 Deputy Chief, Consumer Protection Division
 Elizabeth J. Stern (Maryland CPF No.
 1112090003), *pro hac vice*
 Assistant Attorney General
 Office of the Attorney General of Maryland
 200 St. Paul Place
 Baltimore, MD 21202
 Phone: (410) 576-6417 (Mr. Ziperman)
 Phone: (410) 576-7226 (Ms. Stern)
 Fax: (410) 576-6566
 pziperman@oag.state.md.us
 estern@oag.state.md.us

*Attorneys for Plaintiff Office of the Attorney
 General of Maryland*

MICHAEL T. HILGERS
 Attorney General
 State of Nebraska

/s/ Anna M. Anderson
 Anna M. Anderson (NE #28080)
 Assistant Attorney General
pro hac vice
 Benjamin J. Swanson (NE #27675)
 Assistant Attorney General
 Nebraska Attorney General's Office
 1445 K Street, Room 2115
 Lincoln, NE 68509
 (402) 471-6034
 anna.anderson@nebraska.gov
 benjamin.swanson@nebraska.gov

Attorneys for Plaintiff State of Nebraska

KEITH ELLISON
 Attorney General
 State of Minnesota

/s/ Caitlin Micko
 Caitlin Micko (MN Bar No. 0395388)
 Assistant Attorney General
 Office of the Minnesota Attorney General
 445 Minnesota Street, Suite 600
 St. Paul, MN 55101
 Tel: (651) 724-9180
 Caitlin.micko@ag.state.mn.us

*Attorney for State of Minnesota, by its
 Attorney General, Keith Ellison*

LETITIA JAMES
 Attorney General
 State of New York

/s/ Nathaniel Kosslyn
 Nathaniel Kosslyn, Assistant Attorney General
 (NY Bar No. 5773676), *pro hac vice*
 nathaniel.kosslyn@ag.ny.gov
 Alex Finkelstein, Assistant Attorney General
 (NY Bar No. 5609623), *pro hac vice*
 alex.finkelstein@ag.ny.gov
 New York Office of the Attorney General
 28 Liberty Street
 New York, NY 10005
 (212) 416-8000

JEFF JACKSON

Attorney General
State of North Carolina

/s/ Charles White

Charles G. White (N.C. State Bar No. 57735),
pro hac vice

Assistant Attorney General

Kunal Choksi

Senior Deputy Attorney General

Josh Abram

Special Deputy Attorney General

N.C. Department of Justice

Post Office Box 629

Raleigh, North Carolina 27602

Telephone: (919) 716-6006

Facsimile: (919) 716-6050

E-mail: cwhite@ncdoj.gov

*Attorneys for Plaintiff State of North
Carolina*

DAN RAYFIELD

Attorney General
State of Oregon

/s/ John Dunbar

John J. Dunbar (Oregon Bar No. 842100)

Assistant Attorney General

Oregon Department of Justice

100 SW Market Street

Portland, Oregon 97201

Telephone: (971) 673-1880

Facsimile: (971) 673-1884

E-mail: john.dunbar@doj.oregon.gov

*Attorneys for State of Oregon ex rel.
Dan Rayfield, Attorney General*

PETER F. NERONHA

Attorney General
State of Rhode Island

/s/ Stephen N. Provazza

Stephen N. Provazza (R.I. Bar No. 10435),
pro hac vice

Assistant Attorney General

Rhode Island Office of the Attorney General

150 South Main St.

DAVE YOST

OHIO ATTORNEY GENERAL

/s/ Kevin R. Walsh

Melissa G. Wright (0077843)

Section Chief, Consumer Protection Section

Melissa.Wright@ohioago.gov

Melissa S. Smith (0083551)

Asst. Section Chief, Consumer Protection
Section

Melissa.S.Smith@ohioago.gov

Michael S. Ziegler (0042206)

Principal Assistant Attorney General

Michael.Ziegler@ohioago.gov

Kevin R. Walsh (0073999)

Senior Assistant Attorney General

Kevin.Walsh@ohioago.gov

30 East Broad Street, 14th Floor

Columbus, Ohio 43215

614-466-1031

DAVID W. SUNDAY, JR.

Attorney General
Commonwealth of Pennsylvania

/s/ Jonathan R. Burns

Jonathan R. Burns

Senior Deputy Attorney General

(PA Bar No. 315206), *pro hac vice*

Pennsylvania Office of Attorney General

Strawberry Square, 14th Floor

Harrisburg, PA 17120

717.787.3391

jburns@attorneygeneral.gov

*Attorneys for Plaintiff the Commonwealth of
Pennsylvania*

ALAN WILSON

Attorney General
State of South Carolina

/s/ Anna C. Smith

C. Havird Jones, Jr.

Senior Assistant Deputy Attorney General

Jared Q. Libet (S.C. Bar No. 74975),

pro hac vice

Assistant Deputy Attorney General

1 Providence, RI 02903
2 Phone: 401-274-4400
3 Email: SProvazza@riag.ri.gov

4 *Attorneys for Plaintiff State of Rhode Island*

Anna C. Smith (SC Bar No. 104749),
pro hac vice
Assistant Attorney General
Office of the South Carolina Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
jlibet@scag.gov
annasmith@scag.gov
803-734-0536

*Attorneys for Plaintiff the State of South
Carolina,
ex rel. Alan M. Wilson, in His Official
Capacity as
Attorney General of the State of South
Carolina*

11 **MARTY J. JACKLEY**

12 Attorney General
13 State of South Dakota
14 /s/ Amanda Miiller

15 By: Amanda Miiller (SD Bar No. 4271)
16 Deputy Attorney General
17 1302 East SD Hwy 1889, Suite 1
18 Pierre, SD 57501-8501
19 Telephone: (605) 773-3215
20 Amanda.Miiller@state.sd.us

21 *Attorneys for Plaintiff State of South Dakota*

11 **JASON S. MIYARES**

12 Attorney General
13 Commonwealth Of Virginia

14 /s/ Joelle E. Gotwals
15 Steven G. Popps
16 Chief Deputy Attorney General
17 Thomas J. Sanford
18 Deputy Attorney General
19 Richard S. Schweiker, Jr.
20 Senior Assistant Attorney General and Section
21 Chief
22 Joelle E. Gotwals (VSB No. 76779),
23 Senior Assistant Attorney General
24 *pro hac vice*
25 Chandler P. Crenshaw (VSB No. 93452)
26 Assistant Attorney General
27 *pro hac vice*
28 Office of the Attorney General of Virginia
Consumer Protection Section
202 N. 9th Street
Richmond, Virginia 23219
Telephone: (804) 786-8789
Facsimile: (804) 786-0122
E-mail: jgotwals@oag.state.va.us

*Attorneys for the Plaintiff Commonwealth of
Virginia
ex rel. Jason S. Miyares, Attorney General*

NICHOLAS W. BROWN

Attorney General State of Washington

/s/ Claire McNamara

Claire McNamara (WA Bar No. 50097)

Gardner Reed (WA Bar No. 55630)

Assistant Attorneys General

Washington State Office of the Attorney
General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104

(206) 340-6783

claire.mcnamara@atg.wa.gov

gardner.reed@atg.wa.gov

Attorneys for Plaintiff State of Washington

JOHN B. MCCUSKEY

Attorney General

State of West Virginia

/s/ Laurel K. Lackey

Laurel K. Lackey (WVSB No. 10267)

Abby G. Cunningham (WVSB No. 13388)

Assistant Attorneys General

Office of the Attorney General

Consumer Protection & Antitrust Division

Eastern Panhandle Office

269 Aikens Center

Martinsburg, West Virginia 25404

Telephone: (304) 267-0239

Email: laurel.k.lackey@wvago.gov

abby.g.cunningham@wvago.gov

*Attorneys for Plaintiff State of West Virginia,
ex rel. John B. McCuskey, Attorney General*

JOSHUA L. KAUL

Attorney General

State of Wisconsin

/s/ Brittany Copper

Brittany A. Copper

Assistant Attorney General

WI State Bar # 1142446

Wisconsin Department of Justice

Post Office Box 7857

Madison, Wisconsin 53707-7857

(608) 266-1795

Brittany.copper@wisdoj.gov

Attorneys for Plaintiff State of Wisconsin

/s/ James P. Rouhandeh

DAVIS POLK & WARDWELL LLP

James P. Rouhandeh, *pro hac vice*
Antonio J. Perez-Marques, *pro hac vice*
Caroline Stern, *pro hac vice*
Corey M. Meyer, *pro hac vice*
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
rouhandeh@davispolk.com
antonio.perez@davispolk.com
caroline.stern@davispolk.com
corey.meyer@davispolk.com

COVINGTON & BURLING LLP

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;
Instagram, LLC; Meta Payments, Inc.; and
Meta Platforms Technologies, LLC*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: 10/10/2025

/s/ Krista Batchelder

Krista Batchelder

*Attorney for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*